

Prisoners' Legal Services of New York

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December 29, 2017

Hon. Glenn T. Suddaby, Chief U.S. District Judge
Federal Building and U.S. Courthouse
P.O. Box 7367
Syracuse, NY 13261-7367



RE: H'Shaka v. Bellnier et al., 17-CV-00108 (GTS)(ATB)
DVD to be filed under seal (Docket No. 33)

Dear Judge Suddaby,

Enclosed please find a DVD to be submitted to the Court under seal for its own review, related to Plaintiff's Reply Memorandum of Law in Further Support of Motion for Preliminary Injunction (Docket No. 33).

This is a true and correct copy of a DVD showing the video footage and still photography of the "Special Housing Unit" where plaintiff is confined, taken in the presence of DOCCS personnel during an inspection of premises conducted earlier this fall pursuant to Fed. R. Civ. P. 34(a)(2) and Stipulation Regarding Inspection Tour (Docket No. 24). Defendants' counsel was provided with this DVD in mid-October. As discussed at last week's telephonic conference with Magistrate Judge Baxter, defendants have not responded with any security-related redactions to be made in this footage or photographs, so we are providing a copy to chambers as the functional equivalent of filing it under seal until any such concerns have been raised and resolved.

Sincerely,

Alissa R. Hull
Supervising Attorney

Enc. DVD

cc: Bruce J. Boivin, Esq.
Matthew Reed, Esq.
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